

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
) Cause No. 4:21-CR-00155 MTS/SRW
v.)
)
BRENT M. LAWSON,)
)
Defendant.)

DEFENDANT'S SECOND MOTION FOR EXTENSION OF TIME
TO FILE PRE-TRIAL MOTIONS

Comes now Counsel for Defendant, Brent Lawson, and respectfully requests a sixty-day extension of the filing deadline for pre-trial motions. In support of this motion, Counsel states as follows:

1. Defendant has been charged with one count of Receipt of Child Pornography – Prior Offender.
2. Defense Counsel was able to review the images and videos at the U.S. Attorney's Office on June 22nd. The review was delayed due to some technical issues, but that review is now complete.
3. Based on the review of the evidence, Counsel needs additional time to meet with Defendant, who is confined, and discuss his options. Defendant has requested that Counsel consult with an independent forensic examiner to determine if further review by an expert is necessary. More time is needed to complete this request.
4. Defense Counsel is also in the process of retaining a forensic psychologist to conduct a psychosexual evaluation on Defendant. This evaluation is necessary for plea negotiations, and for sentencing. Because Defendant is confined, and due to the psychologist's

schedule, it will take some time to set up the evaluation. Therefore, more time is also needed to complete this task.

5. A trial date has not been set for the cause.

6. The Government has no objection to this request for an extension per Assistant United States Attorney Jillian Anderson.

7. This request for an extension of time is made in good faith for all the reasons listed herein and not to vex or harass the Court or the Government, but to ensure Defendant's Sixth Amendment right to effective assistance of counsel. The ends of justice will be best served by excluding these periods of delay from calculating deadlines that would otherwise apply. 18 U.S.C. §3161(h)(7)(A) and (B)(iv).

WHEREFORE, for the foregoing reasons Counsel for Defendant requests a sixty-day extension of the deadline to file pre-trial motions.

Respectfully submitted,

FRANK, JUENGEL & RADEFELD,
ATTORNEYS AT LAW, P.C.

By s/ Joseph W. Flees

JOSEPH W. FLEES (#60872MO)
Co-Counsel for Defendant
7710 Carondelet Avenue, Suite 350
Clayton, Missouri 63105
(314) 725-7777

CERTIFICATE OF SERVICE

I hereby certify that on June 25, 2021, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following.

Jillian Anderson
Asst. United States Attorney
111 South Tenth Street, 20th Floor
St. Louis, Missouri, 63102

/s/ Joseph W. Flees _____

JOSEPH W. FLEES